

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI

**M.B.**, a minor by and through her next friend,  
Kanwar Singh Bedi

Case No. 3:13-cv-00241-DPJ-FKB

*Plaintiff,*

v.

**Rankin County School District,  
and**

**Charles Frazier**, Individually and in his Official  
Capacity as Principal of Northwest  
Rankin High School,

*Defendants.*

**COMPLAINT**

Seeking to protect her individual civil liberties and constitutional rights, the plaintiff identified above (the “Plaintiff”), a minor represented by her next friend, Kanwar Singh Bedi (“Mr. Bedi”), through their counsel, William Burgess and Monica Miller of the American Humanist Association, and Dianne Herman Ellis and Rita Nahlik Silin of Silin & Ellis, as her amended complaint against the defendants identified above (collectively, the “Defendants”), being (i) the Rankin County School District (the “School District”) and (ii) the principal of Northwest Rankin High School (“the School”), Charles Frazier (“Principal Frazier”), individually and in his official capacity as principal, in a cause of action under 42 U.S.C. § 1983, alleges as follows:

## **NATURE OF THE CLAIMS**

1. This action arises out of the Defendants' policy and practice of sponsoring school assemblies (the "Christian Assemblies") that promote religion, and Christianity specifically, to its students during the school day. The Defendants' sponsorship, presentation and promotion of these Christian Assemblies, and its excessive entanglement with the Pinelake Baptist Church, violate the Establishment Clause of the First Amendment of the United States Constitution, as applied to Mississippi by the Fourteenth Amendment thereof.

2. The Plaintiff seeks injunctive and declaratory relief and damages under 42 U.S.C. § 1983 against the Defendants to redress this Establishment Clause violation, together with recovery of attorney's fees and costs under 42 U.S.C. § 1988 (b).

## **JURISDICTION AND VENUE**

3. This case arises under the First Amendment to the Constitution of the United States and presents a federal question within this Court's jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343 (a)(3). The Court has the authority to issue a declaratory judgment under 28 U.S.C. § 2201 and to provide injunctive relief and damages under 28 U.S.C. § 1343 and Fed. R. Civ. P. 65.

4. Venue is proper within this judicial district pursuant to 28 U.S.C. § 1391 (b)(2) because the events giving rise to the Plaintiff's claims occurred herein.

## **PARTIES**

5. M.B., a minor, is the Plaintiff in this case, and pleads by and through her next friend, Mr. Bedi, who is also M.B.'s father.

6. M.B. is a sixteen-year-old who was in her junior year at the School at the time the events complained of herein occurred. She lives in Brandon, Mississippi.

7. The Plaintiff does not wish to encounter her School affiliating itself with, preferring and promoting religion by staging events such as the Christian Assemblies.

8. The School District operates the public schools in Rankin County, Mississippi, and may be served with process upon its Superintendant, Dr. Lynn Weathersby at 1220 Apple Park Place, Brandon, MS 39042.

9. Charles Frazier is the principal of the School. He is sued in his individual and official capacities and may be served with process at 5805 Hwy 25, Flowood, MS 39232.

## **FACTS**

10. The facts alleged as to the parties stated above are incorporated herein by reference.

11. On April 9, 2013, the School held the first of several assemblies that sponsored and promoted Christianity.

12. Each assembly was presented by a group of students affiliated with the Pinelake Baptist Church.

13. The Christian Assemblies were held during the school day on school grounds.

14. Attendance in at least two of the Christian Assemblies was required for all students at the School of a particular grade level.

15. The first mandatory assembly (the “Senior Assembly”) was for the senior class, which took place on April 9.

16. Senior students were not provided with an option to leave the assembly.

17. The second mandatory assembly (the “Junior Assembly”), which took place on April 10, was for the junior class.

18. Junior students were not provided with an option to leave the assembly.

19. The School originally scheduled similar Christian Assemblies to be held for the freshman and sophomore classes later in the week. However, these two assemblies were temporarily postponed.

20. On Friday, April 19, the School held the third Christian Assembly, which was for the freshman class (the “Freshman Assembly”).

21. On Monday, April 22, the School held the fourth Christian Assembly, which was for the sophomore class (the “Sophomore Assembly”).

22. All four assemblies took place on school property during school hours.

23. School employees supervised all four assemblies and faculty and staff were present at each of the assemblies.

24. The same video, which was created in part by students affiliated with the Pinelake Baptist Church, was shown as part of all four assemblies.

25. All four assemblies included a presentation delivered by a student affiliated with the Pinelake Baptist Church.

26. The presentation in all four assemblies included numerous references to God and Jesus Christ.

27. Each Christian Assembly included a sermon delivered by a student affiliated with the Pinelake Baptist Church.

28. Each of the Christian Assemblies ended with a Christian prayer.

29. At some point during the 2012-2013 school year, Principal Frazier spoke with several students about the assemblies.

30. The students he spoke with are affiliated with the Pinelake Baptist Church.

31. Principal Frazier and those students discussed and approved the theme and general content of the Christian Assemblies.

### **The Senior Assembly**

32. On April 9, 2013, Principal Frazier sent an e-mail message to all faculty members at 8:04 a.m. instructing them to send students to an assembly in the Performing Arts Building (“PAB”). The e-mail read in full: “Sorry for the late notice. All seniors will need to report to the PAB during Cougar Connection. They should report directly from 5<sup>th</sup> block. Thanks.”

33. The School did not inform the students what the presentation at the Senior Assembly would be about or who would be making it. The students were only told to go to the assembly.

34. The senior students attending school that day did not have an option to go anywhere other than the assembly.

35. Once the students and faculty arrived in the PAB, a student openly affiliated with the Pinelake Baptist Church (the “Church Representative”) started to give a presentation about finding “hope” in “Jesus Christ.”

36. The Church Representative opened the Senior Assembly stating: "Today we are just here today to talk about hope . . . and where we have found it."

37. After about a minute of introductory comments, he played a video for the students.

38. The video profiled four young men it claimed once led troubled lives.

39. The first statement made by one of the speakers in the video is: "Hope is fixing your eyes on an eternal purpose."

40. The speakers in the video described various behaviors that either they, or someone they knew engaged in, which included sex, drugs, self-cutting, and suicide.

41. The first speaker talked about his addiction to pornography. The second speaker talked about issues with his father. The third speaker also talked about problems with his family, as well as promiscuity and suicide.

42. The fourth speaker said he had a great family that introduced him to the church. He said at first he did not think he could measure up to Jesus Christ so he sought hope in "other things."

43. The first speaker said he used to find hope in "cars and clothes." The second said he "used to find hope in people" and in "other guys." He looked to these people for "brotherly love" and "fatherly love." He said he then struggled with suicidal thoughts, and resorted to "cutting himself."

44. The third speaker discussed his grandfather's suicide. He said had previously turned to his grandfather for hope. He also found his hope in "women and girls" and would see how many of them he "could get." He said he was setting himself up for failure.

45. The fourth speaker also said he used to find “hope in relationships with other people” and “in himself” and in his “materialistic living.”

46. About five minutes into the video, the first speaker stated: “But now I find my hope in something that’s more eternal, that is not in this world.”

47. In turn, each of the speakers explained how turning to Jesus Christ solved their problems and recommended that other people turn to Jesus Christ as well.

48. The second speaker said “Now I find my hope in God,” and that “he shows me the love my father could never show me.” “He’s taken me in as his son.” He “taught me how to be a man.”

49. The third speaker said: “But now, I found my hope in the one true Father who is God. He is the one that can fulfill relationships.” He realized that “He is that happy ending.”

50. The fourth speaker stated: “But now I found hope in my personal savior.”

51. The video concluded with clapping from the audience.

52. The audience included teachers, administrators, and other School employees.

53. Once the video ended, the Church Representative summarized the video in regards to how Jesus Christ helped the young men and other troubled teens, and told the students that Jesus could help them too.

54. The Church Representative said: “We wanted to come here today to tell you about what hope is.” He stated that they came there to ask “what do you find hope in.” He said: “some of us have come from broken backgrounds.”

55. He continued: “Each one of us has a story and the story that you guys heard from those guys up there is where they used to put their hope in . . . the first one was in his

grandfather. For some of them it was a relationship with a girl or just a friend. For some of them it was maybe it was alcohol or drugs. And that's where they found hope. But the fact is every single one of those guys that shared there story told you that they came up empty. Because they were broken and because these things are material and they run out and they are of this world."

56. The Church Representative continued: "So maybe many of you struggle with the same things you come from a home in which your parents divorced at an early age . . . you have a scar in your life and you begin to try to fill it with something of this world and it ran out, it didn't satisfy you and so you continue to search and you continue to look and it became a greater problem. We are here today to tell you where we find our hope. We find our hope in Jesus Christ."

57. He continued: "As I say that I know some of you go, 'Yeah, I know who Jesus is and I'm not really . . . I'm not about that life.' And we know it is not cool for us to stand up here and tell you that we follow Jesus. We understand that. But that's okay. Because we care about you so much that there is no way that we could graduate from high school and have a hope that we believe is for our eternity and not share it with you guys. How selfish of us would that be. That we know there is a life changing hope out there and we not share it with you."

58. The assembly immediately turned into a sermon on the supposed miracles, powers, and teachings of Jesus Christ. The Church Representative encouraged all students to find sanctity in Jesus.

59. The Church Representative specifically encouraged those who did not believe in "Jesus Christ" to "just be open."

60. He then explained: “some of you may not know who Jesus is and say ‘who is this Jesus?’ Jesus was God’s son and he came to earth over 2,000 years ago and for 33 years he walked the earth. He lived a perfect life. Something that no one else has done. He lived a perfect life. See we all in our past, we all have messed up. We’ve all failed. And it is because of this that our relationship with God is [unclear] . . . there was a gap between us and God because God is perfect and human is not. Then Jesus came knowing the end was in mind and his ultimate purpose to come to earth was to die. Not a normal death. But a death for each and every one of you and a death for me. That was his purpose. See, before Jesus came, innocent blood had to be shed for our sins. There had to be an animal that was sacrificed to atone for our sin. There had to be innocent blood. So Jesus came and he was the innocent blood because he lived a perfect life. He was that innocent blood. See the last few years of Jesus’ life he traveled from region to region and country to country and he had 12 disciples that followed him everywhere. And he talked about the hope he was bringing.”

61. The Church Representative then discussed the “miracles of Jesus” as follows: “And he did many signs of miracles, he made the . . . [unclear], the blind could see, the deaf could hear, he would cast out evil demons, he would drive them out. But the people of that day disses [unclear] who he was even though he did all these things, they still disses [unclear] who he was because they thought Jesus was coming as an earthly king. They thought he was coming to reign here. And be glorified here. But that is not what Jesus came to do. Jesus came to be last. When he was on earth Jesus came to be last . . . And so even though Jesus was perfect he was condemned as a man that ought to die. And he was beaten, he was spit on and he was mopped and he was whipped and he was he was nailed to the cross. And when he was nailed to

the cross your sins, all your past failures, all your present failures, all your future failures, all my failures were nailed to the cross with Jesus. Then he died. But see our hope is not in the death of Jesus. That's not where we find hope. But our hope comes three days later when on that Sunday morning the disciples . . . went to the tomb where Jesus was they found that the stone had been rolled away and in its place was the angel of the Lord and the Angel Lord said he is not here for he has risen. Our hope is in the life that Jesus offers. Because he defeated sin. He defeated death. And he is victorious. And Jesus offers the same life to you, forgiveness, grace, love, mercy and hope for each and every one of us . . . Before Jesus we were dead in our sin. But Jesus came to give us life. He came to bridge the gap. He laid down his life and the gap between us and God so that through him we may have life abundantly. As Christians God calls us to more than just a Sunday life . . . More than just saying I believe in Jesus but not acting like it . . . us guys will tell you we're not perfect we don't claim to be and we don't want to be because if we were perfect we wouldn't be Jesus. We still struggle just like all of you. Though we try on a daily basis to have a relationship with God. That's what he calls us to . . . a daily relationship with God. In which we . . . learn more value and try to live a life that exemplifies that. But we still mess up . . . but that's the beauty of the gospel is that we are not who we used to be, our identity is not who we used to be, it's not in our previous failures, it's in Christ. As a Christian our identity is in Christ and what he came to do for us."

62. Concluding this sermon, the Church Representative led the students in a Christian prayer.

63. He said: "Ephesians 1:7 says in Him we have redemption through His blood, the forgiveness of sins, in accordance with the riches of God's grace. The sin that separated us from

God was paid for on the cross. And you have my hope today. Jesus says for anyone that calls Him in the name of the Lord will be saved, wherever you are, for anyone who calls in the name of the Lord will be saved. You confess with your mouth and believe in your heart, salvation will come. I just pray for you guys.”

64. At no time did the Defendants turn off the video or stop the speaker from delivering a religious message or praying.

65. Indeed, attendance at the assembly was compulsory for students in the senior class.

66. Senior class students in attendance at the School that day were not given an option by Defendants to leave the assembly or go anywhere other than the PAB for the assembly.

67. Faculty and parents stood near the exit door, preventing students from leaving.

68. There were about twenty to thirty staff members present at the Senior Assembly.

69. There were about five to ten parents present at the Senior Assembly.

70. The parents were the family members of the speakers affiliated with the Pinelake Baptist Church.

71. Several students who attempted to leave the Senior Assembly were prevented from doing so.

72. A school employee in charge of “attendance and truancy” at the School, Jeff White (“Mr. White”), told the students to sit back down.

73. Many students thought the presentation was inappropriate and felt that it discriminated against their beliefs.

74. A senior, who is not a party to this suit, took video footage of the Senior Assembly.

75. At some point after the Senior Assembly, several students asked a School administrator if they could hold a non-Christian assembly (either on Islam or promoting secularism) at the School.

76. The administrator told the students they could not have such an assembly.

### **The Junior Assembly**

77. On April 10, 2013, the School held a compulsory assembly for the junior class, consisting of the same video and a similar presentation given the previous day to the senior class.

78. The eleventh grade students were called out of their homeroom class sometime around 9:40 a.m. and were told to go directly to the PAB.

79. The Defendants did not inform the students of the nature of the presentation beforehand.

80. M.B. was required to attend this assembly.

81. The School did not provide M.B. with an option to leave the assembly.

82. M.B. was informed by some of her senior friends beforehand that the assembly would be a Christian presentation.

83. Before the assembly started, M.B. and a several of her friends attempted to go to the library or another classroom.

84. The Defendants did not allow these students to leave the PAB.

85. Specifically, Mr. White refused to allow these students to leave the PAB and spend time in a monitored library.

86. M.B. felt pressure from the teachers to attend the assembly as well.

87. None of the teachers informed the students of the content of the assembly.

88. The Junior Assembly took place roughly around 9:40 a.m. during homeroom.

89. The Junior Assembly proselytized Christianity and included a Christian prayer.

90. Once the junior class and relevant faculty members arrived in the PAB, the presentation began with a discussion on “hope.”

91. The Junior Assembly began with an introduction by a student affiliated with the Pinelake Baptist Church (the “Church Representative.”).

92. During the introduction, the Church Representative told the students in the audience that “a couple months ago” he talked to “Dr. Frazier” about the idea of putting on the assemblies and that, together they came up with the “word hope” as the theme for the assemblies.

93. The Church Representative proceeded with his introduction, stating: “So we decided we wanted to talk to you guys about hope today. Um, we’ve been through a lot of things all of us have, through our high school and middle school careers.”

94. He continued, “And in that lifetime we try to find our hope . . . in things like appearance, approval, popularity, relationships and the list goes on.”

95. After he concluded the introduction, the lights were dimmed and the video started. The video was the same video shown in the Senior Assembly.

96. After the video ended, the audience clapped.

97. The audience included students, faculty and administrators.

98. One of the speakers from the video, who is affiliated with the Pinelake Baptist Church, walked up to the stage of the PAB and delivered a presentation to the students.

99. The presentation was a sermon about finding hope in Jesus Christ.

100. The speaker began by stating that he used to find hope through seeking “acceptance from other people.” He said “I needed that love and I tried to get it from people.” He went on to say that finding hope in people is problematic.

101. The speaker explained that when he didn’t find hope in people, he went to an even “darker place,” noting “I struggled with pornography.” He said that pornography “just sucked me into an even deeper whole.”

102. The speaker continued: “my life was falling apart. About four months ago I was able to find hope. And um its something that we all need and that without out it . . . we are hopeless and all these . . . things we um cover up our lives with . . . they all fade away.”

103. The speaker then told the students a Biblical story to explain why they should find hope in Jesus Christ.

104. He said: “There were these two girls. They were sisters. And one of them lives a really fast-paced lifestyle. Running around doing everything she could, getting this ready, worried about the details here, struggling with this, running around doing this. And in the end she wasn’t spending her time where she needed to be spending her time. She was just lost and distracted. And when you’re distracted you can’t see anything that’s really important. Um so then there’s her sister. Her sister wanted to slow things down. And she spent time with those who mattered most to her. And she invested in people that mattered to her. And all this time she constantly wanted to be with people that she loved. And no matter, the fact that she struggled,

yeah she struggled, but the fact that she would spend her time with the one thing mattered the most is what gave her the joys of life, gave her hope. Um these people that I am talking about um the one who um lost track, her name is Martha. And the one who was um following um, following God actually was, her name is Marry. And they were sisters. And the person that I am referring to [that she would spend time with] is Jesus.”

105. The speaker continued: “I know that causes a lot of people to shut off. But I’m hoping that you all can stay with me for just a little bit.” He said, “I would not be a loving friend to any of you all at all, and I do love you all, um, but I would not be a loving friend to any of you all if I did not tell you about the hope that I have, the hope that we have.”

106. This story comes from the Gospel of Luke.

107. The speaker continued: “There was a gap between us and God.” He said that every “single time we mess up, we make mistakes whether it’s in our past, present or future, that separated us, it created a gap between us and God. And at the very beginning . . . we were able to spend time with God.”

108. He continued: “But then when we made mistakes everything fell apart. And so what they would do to get back right with God was they would sacrifice an animal. Um, usually a pure animal like a lamb. And um shed that blood of that animal, would bring yourself back so you could be right with God.”

109. The speaker preached about how “God” “sent his son. The son that he loved. And he sent him to this earth with the sole purpose to die for a bunch of people that he created.”

110. He continued: “But the truth is he only did it because he loved us.” The speaker explained: “He loved us so much that he went to, um he came down here from being God, to

being an almighty Creator, and he went down and he decided to be the lowest of the low and dying for a bunch of people.”

111. The speaker said: “And when he died for us, when he went on the cross.” He explained that Jesus “got beatings,” and was “physically abused, um with all the beatings and everything, um and then finally being nailed to the cross.”

112. He continued: “not only was he going up on that cross um, but so were all of our mistakes. Our sins. Our, um, our failures. Every single time we failed he put it on that cross.”

113. After explaining how Jesus was nailed to the cross, the speaker preached: “Your struggles, your addictions are finished. Your loneliness, finished. Your depression is finished. Every single struggle that he had, he put up there and he put it to death. But we don’t find hope in the fact that he died on the cross for us.”

114. He explained: “We put hope in the fact that three days later he arose” and “he came back and he’s still alive today. I’ve experienced his love and I’m so thankful for him. It’s like I could not be able to love ya’ll without telling ya’ll about him.”

115. The speaker continued his sermon, noting: “I’ve often wondered about falling too far for God to love me. If I’ve done too much or if I’ve gone too far.” He said, “Something that gave me assurance was his story. While, uh, while Jesus was being crucified there were actually three crosses up that day. And the people to the left and right of him were criminals.”

116. He continued: “And these criminals um, one of them, the one to the right, who was yelling at him just like the crowd was, saying if you’re the son of God why don’t you save yourself and save us while you’re at it . . . But then the other man, he actually calls Jesus God, and he said, he looked over at Jesus and said, we do not, he did not deserve this, he does not

deserve to die, he has done nothing wrong. But we are getting to us what we deserve, 'cause we have committed crimes, and we deserve to die."

117. The speaker went on: "Jesus told God and said, truly I say to you. Today we will be with you in paradise. Not tomorrow, not ten days from now, not ten years from now, today. And the fact is we need assurance that hope can come today. That we are not held back from hope. That today, my pain can go away. My loneliness can go away. Your loneliness can go away. Every struggle you've ever had can go away. 'Cause he offers forgiveness and he offers his love."

118. This speech ended with a Christian prayer, which included the following language: "God, we are so thankful for you, Lord. We are so thankful for all that you have done for us. And that you love us no matter how many times we have rejected you. We thank you for sending your Son to die for us and for loving us so much that he would take on the cross for us."

119. The speaker prayed for the people to "renew their spirits Lord. And bring them back because you love them so much. And your pursued them all your life – all their lives. And you loved them."

120. The prayer ended with "Amen," and the audience, which included students, faculty and administrators, echoed with "amen."

121. After the speaker concluded the prayer, he passed the microphone to another speaker, who was also affiliated with the Pinelake Baptist Church.

122. The second speaker told the audience that "Christ has changed our lives." He added: "What matters is that we know there is hope in Christ and that there is a savior that wants to have a relationship with you. That's what we are here to tell you all. That there is everlasting

life with him. And you can ask any of these guys up here with me. No one is perfect, we don't claim to be. 'Cause we screw up."

123. The speaker continued: "But our call in life and our goal is to follow God. And have a relationship with Him. And grow that relationship daily by leading with his word and praying with Him." He opined, "How selfish of us would it be if we didn't share His hope with you all."

124. He continued, "If we knew that there was a Savior that . . . wants to have a relationship with you. The Creator of the universe wants to know you personally and you can have everlasting life with Him in paradise. And we didn't share that with y'all. So that's why we're here."

125. The speaker then invited the students to come up and talk with the speakers on their way out of the PAB. He explained: "Chances are you may be in one of three situations right now. One, you may be a believer . . . and you just need encouragement and that know exactly how to renew your relationship with Christ and grow with him. Or two, you are not a believer but you want to know Christ, and you want to know about following and having a relationship with him. We will pray with you and we will talk with you through that. Three, you may disagree with everything that we've talked about today. You may be of a different faith or an atheist. And you just wanna share your voice with us. We will talk to you about that. We would love to have a conversation with you about what you believe. And so, with that being said . . . we are gonna be here until everyone leaves the PAB. And so, please don't hesitate to come up here and ask questions."

126. During the assembly, some students attempted to stand up and leave upon discovering the Christian nature of the assembly.

127. However, these students were barred from exiting by School staff.

128. M.B. felt forced to attend a Christian assembly with which she was not comfortable.

129. There has never been a similar assembly on Atheism, Humanism, Judaism, Islam, Scientology, Buddhism, Hinduism or any other non-Christian religion at the School.

130. On April 11, 2013, the AHA sent a letter (the “AHA Letter”) to Principal Frazier. The AHA Letter informed the Defendants that the Christian Assemblies and the School’s policy of permitting them were unconstitutional and asked that they be stopped immediately.

131. The freshman and sophomore assemblies were temporarily postponed.

### **The Freshman Assembly**

132. On Friday, April 19, 2013, the Defendants held the Freshman Assembly.

133. The Freshman Assembly included the same Christian video that was shown in the Junior and Senior assemblies, and included a presentation by a student affiliated with the Pinelake Baptist Church.

134. The Freshman Assembly was held on school property during school hours.

135. School employees supervised the Freshman Assembly.

136. Faculty and staff attended the Freshman Assembly.

137. The Freshman Assembly included a sermon about finding hope in Jesus Christ.

### **The Sophomore Assembly**

138. On Monday, April 22, 2013, the Defendants held the Sophomore Assembly.
139. The Sophomore Assembly was announced by the School administration through the official school e-mail system.
140. Like the previous Christian Assemblies, this one also took place on campus during school hours.
141. The presentation included a screening of the same Christian video shown in the previous Christian Assemblies.
142. School employees supervised the Sophomore Assembly.
143. Faculty and staff attended the Sophomore Assembly.
144. The Sophomore Assembly included a sermon about finding hope in Jesus Christ.

### **CAUSES OF ACTION**

145. All preceding allegations are incorporated herein by reference.
146. The Defendants' de facto policy and practice of permitting, sponsoring, staging, promoting, monitoring and presenting the Christian Assemblies violates the Establishment Clause of the First Amendment to the United States Constitution.
147. The Defendants acted under color of state law in violating the First Amendment as described herein in violation of 42 U.S.C. § 1983.

## **RELIEF SOUGHT**

The Plaintiff requests that this Court grant the following relief:

1. A declaratory judgment that the Defendants' policy and decision to permit, sponsor, stage, present, promote and encourage or require attendance at the Christian Assemblies violates the Establishment Clause of the First Amendment of the United States Constitution and is a violation of the Plaintiff's constitutional rights under 42 U.S.C. § 1983;
2. A permanent injunction enjoining the Defendants, their successors and any person in active concert with the Defendants, including the Pinelake Baptist Church or any person affiliated therewith, from knowingly, intentionally, or negligently presenting or allowing to be presented religious assemblies at any of its public schools;
3. A judgment in the Plaintiff's favor for nominal damages;
4. An award to the Plaintiff of her reasonable costs, disbursements and attorneys' fees as allowed by law from the Defendants pursuant to 42 U.S.C. § 1988;
5. An award to the Plaintiff of punitive damages against Principal Frazier in his individual capacity for his reckless disregard for Plaintiff's constitutional rights; and
6. An award of such other and further relief as the court shall deem just.

Respectfully submitted this 29<sup>th</sup> of May, 2013.

/s/ Rita Nahlik Silin  
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Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I, Rita Nahlik Silin, hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record.

This the 29th day of May, 2013.

/s/ Rita Nahlik Silin  
Rita Nahlik Silin  
Attorney for Plaintiff